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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**INDEX NEWSPAPERS LLC**, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; and **JOHN DOES 61-200**, federal agents,

Defendants.

**Case No. 3:20-cv-1035-SI**

**THIRD JOINT STATUS REPORT**

Pursuant to this court's order of November 13, 2024, (Dkt. 308), the parties submit this joint status report to update this court on the status of the parties' settlement discussions.

The parties are happy to report that they have reached a tentative settlement of all claims remaining in this matter through Judge Beckerman's mediation. Per the Portland City Charter, that agreement still must be approved by the Portland City Council to become effective. The Council's timeline for considering settlements has been slowed by the City of Portland's transition to a new form government effective January 1, 2025, but the parties are hopeful that their tentative agreement can be ratified by the Council before the end of February, 2025. The parties therefore respectfully request leave to submit a joint status report on or before January 28, 2025, to update this court on the status of their intended settlement.

DATED: January 10, 2025

By: /s/ Denis M. Vannier  
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By: /s/ Matthew Borden [authorized signature]  
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